

EXHIBIT 50

INTERROGATORY #1

Qualified Absentee Elector P.S. 25 §3146.1

1. Applications were received via the USPS, Online or in person.
2. Application received via USPS or in person were placed in two separate piles
 - a. Absentee
 - b. Mail in
3. Applications received via the Online Application were placed into two categories designated by the State either OLRAVB for Absentee or OLMAILV for mail in requests.
4. Applications received via USPS and in person were data entered into the states SURE system.
 - a. Once data was entered, application information was verified to make sure the requester was in fact a qualified registered elector of Wyoming County.
 - b. Name, address, date of birth, driver's license, (and /or last four digits of social security) signature and political party was verified.
 - c. Application was then approved or rejected
 - d. Applications are then filed according to precinct and name.
5. Absentee ballot requests would only be denied if the requester was
 - a. Not registered – Voter Registration applications were sent to these individuals.
 - b. Registered as anything other than Republican or Democrat. Applicant was notified by letter and given the opportunity to change their affiliation.
 - c. Registered in another County in which case the application would be forwarded to the county of registration.
 - d. Duplicate application
6. After application has been approved two ballot labels are generated, printed and placed on two separate envelopes.
 - a. First envelope contains all balloting material, ballot, secrecy envelope, and instructions. This is used to mail to the elector.
 - b. Second envelope; is for the voter to return their voted ballot inside the secrecy envelope, this label has a bar code, name, and address of the voter.
7. Wyoming County only mailed applications to voters who requested an absentee/mail in ballot. Both political parties did send a mass mailing to qualified registered electors. Application is also available on the County web site.
8. Wyoming County does not frank or provide postage paid envelopes for the return of the voted ballot.
9. Wyoming County will follow the same procedure for the November 3, 2020 Election.

INTERROGATORY #2

25 P.A. Election Code

Act 77 of 2019

Act 12 of 2019

INTERROGATORY #3

3146.6 Voting by Absentee Ballot

Wyoming County procedures for absentee/mail in ballot

Once a ballot is received by the Wyoming County Board of Elections it is scanned into the state SURE system, the signature is verified; the ballot is then recorded as being returned. Ballots will either be delivered by the US postal service or hand delivered to the office in accordance with P.A. 25 §3146.6.

Wyoming County does not frank or prepay postage.

Wyoming County does not see any change in the process for the November 2020 Election, unless there is a change in the statutory requirements.

INTERROGATORY #4

Received e-mail notification earlier in 2020 from the Department of State which made reference to the use of drop boxes throughout the county in order to collect voted ballots. I no longer have that e-mail. I discussed informally with the County Board directly after receiving the e-mail. I advised against drop box locations, as it is in conflict with 25 P.S. §3146.6 of the Election Code. Wyoming County did not utilize drop boxes for the June 2, 2020 Primary.

INTERROGATORY #5

Wyoming County will not be using drop boxes for the November 3, 2020 Election, as said usage violates 25 P.S. § 3146.6 of the election code. Electors can return absentee/mail in ballots via USPS or in person to the Wyoming County Election Office.

INTERROGATORY #6

PA Election Code

INTERROGATORY #7

PA Election Code

ACT 77

ACT 12

E-mail date 5/28/2020 from Jonathan Marks

- A. County Election Board convened at 7 O'clock AM on June 2, 2020 to begin the canvassing process. Board of Election was given one precinct at a time to open. The outer envelope was opened, secrecy envelope was removed, placed into a pile and shuffled, secrecy envelope was opened and ballot removed and placed into a pile to be scanned for tally. Ballots were then scanned by precinct into the Clear Count unit located in the County Election office and totals were suppressed until 8 PM after the polls were closed. Wyoming County Election Board intends to use the same process for November 3, 2020.
- B. Approximately 20 ballots arrived at the Wyoming County Elections office that were not inside a secrecy envelope. Referencing the May 28, 2020 E-mail from Jonathan Marks, these ballots were included in the total count. To my knowledge, all declarations were completed. When the ballot is received in the Election Office, the return barcode on the outer envelope is scanned into the State SURE system. Once scanned it pulls up the voter record including signature on file; that signature is verified with the signature on the declaration.
- C. P.A. 25 §3154- does allow for Attorneys and Watchers to be present during the canvass of the ballots, Wyoming county did not receive a request for anyone to be present for the June 2, 2020 Primary. Wyoming County will strictly adhere to 25 P.S. § 3154 for November 3, 2020 General Election.

INTERROGATORY #8

ACT 77

Act 12

PA Election Code

E-mail Dated 5/28/2020 from Jonathan Marks

INTERROGATORY #9

When a completed application for a mail in/absentee ballot is received by the County Election Office, it is data entered into the State SURE system. Application is then verified against an active registered eligible elector and is approved. The SURE system will automatically generate a watermark message to appear in the district poll book. "ABSENTEE – ISSUE

PROVISIONAL" OR "MAIL-IN – ISSUE PROVISIONAL"

Once the ballot is returned by the elector, the barcode is scanned, signature verified through the SURE system. SURE, will automatically generate a watermark message to appear in the district poll book. "ABSENTEE – BALLOT CAST/NOT ELIGIBLE" OR MAIL- IN –BALLOT CAST/NOT ELIGIBLE"

If the ballot is not returned the message "ABSENTEE – ISSUE PROVISIONAL" OR "MAIL-IN – ISSUE PROVISIONAL" will remain in the district poll book alerting the poll worker to issue a provisional ballot. Wyoming County poll workers are instructed to call the office prior to issuing any provisional ballot. This practice allows us to confirm that no ballot has been returned, prior to issuing a provisional ballot.

Provisional ballots are collected from each precinct election night as the returns are delivered. The day following, the Provisional ballots are investigated and verified. Poll books are checked for signatures, the elector's SURE record printed and attached. This also shows date last voted, as a form of verification that the Elector only cast one ballot. Provisional Ballots are then taken before the Board of Elections on the Friday after the Election with an explanation as why it was issued. The County Election Board decides if the ballot will be counted, partially counted or rejected.

INTERROGATORY #10

PA Election Code

Department of State ACT 77 County Review Meeting 2/26/20

Department of State ACT 77 County Review Meeting 2/27/20

Department of State Statewide Uniform Registry of Electors (SURE) project ACT 77, Release Notes 3/27/2020

Training Material and correspondence to poll workers

INTERROGATORY #11

- A. 70 Electors applied for Absentee/Mail In ballots and voted using a Provisional Ballot.
- B. None
- C. None
- D. None

INTERROGATORY #12

Watcher's certificates are issued as requested by Party or Candidate. Requested certificates must be on Party or candidate letterhead. List must contain the name, address, and location.

Wyoming County does not intend to make changes for the November 3, 2020 election, unless presented with a new statutory requirement.

INTERROGATORY #13

PA Election Code

Memo from Department of State dated August 2008, Rights of Watchers

14. A. Wyoming County received 2,835 voted ballots from registered electors. I did not keep record of how the ballot was returned. Ballots were received by the USPS or by individual electors.

- i. none
- ii. none
- iii. none
- iv. none
- v. 2,819
- vi. 16

B. unknown

- i. unknown
- ii. unknown
- iii. unknown
- iv. unknown
- v. unknown
- vi. unknown

C. none

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. A. ACT 77 [republican lawsuit\Act 77 of 2019.pdf](#)
- B. ACT 12 [republican lawsuit\2020 Act 12 - PA.pdf](#)
- C. PA ELECTION CODE <https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/25/25.HTM>
- D. E-MAIL DATED 5/28/2020 FROM JONATHAN MARKS [republican lawsuit\jon marks Important DOS Email re Absentee Mail-in Ballot Canvass.pdf](#)
- E. E-MAIL DATED 4/21/2020 FROM MICHAEL MOSER [republican lawsuit\mike moser PADOS ElectionOperationsDuringCOVID-19 v1.pdf](#) [republican lawsuit\mike - PA DOS Email Act 77 Act 12 Update 4.21.2020.pdf](#)
- F. MEMO FROM SURE DATED 3/27/2020 [republican lawsuit\DOS Agenda Act 77 County User Review Session 2 27 2020.pdf](#)
- G. DEPARTMENT OF STATE USER REVIEW SESSION DATED 2/26/2020 [republican lawsuit\DOS Agenda Act 77 County User Review Session 2 26 2020.pdf](#)
- H. DEPARTMENT OF STATE USER REVIEW SESSION DATED 2/27/2020 [republican lawsuit\DOS Agenda Act 77 County User Review Session 2 27 2020.pdf](#)
- I. ELECTION OFFICIALS GUIDE TO ELECTION DAY PROCEDURES [republican lawsuit\WYOMINGCTY TRAININGMAN 09.04.2019.pptx](#)
- J. E-MAIL ATTACHMENT SENT TO POLLWORKERS [republican lawsuit\AGENDA.pdf](#)
- K. MEMO FROM DEPARTMENT OF STATE USE OF FACILITIES AS POLLING PLACES DURING COVID-19 [republican lawsuit\Polling Places during COVID Guidance.FINAL.5.5.20.pdf](#)

- L. OPENING AND CLOSING THE POLLS INSTRUCTIONS FROM CLEAR BALLOT [republican lawsuit\OPENING CLOSING THE POLLS - CAST with BOX 20200416.pdf](#)
- M. MEMO FROM DEPARTMENT OF STATE RIGHTS OF WATCHERS, CANDIDATES & ATTORNEYS [republican lawsuit\Rights of Watchers Candidates Attorneys \(002\).pdf](#)

- 2. A. ACT 77 [republican lawsuit\Act 77 of 2019.pdf](#)
B. ACT 12 [republican lawsuit\2020 Act 12 - PA.pdf](#)
C. PA ELECTION CODE <https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/25/25.HTM>

- 3. A. ACT 77 [republican lawsuit\Act 77 of 2019.pdf](#)
B. ACT 12 [republican lawsuit\2020 Act 12 - PA.pdf](#)
C. PA ELECTION CODE <https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/25/25.HTM>

- 4. PA ELECTION CODE <https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/25/25.HTM>
- 5. PA ELECTION CODE <https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/25/25.HTM>
- 6. A. ACT 77 [republican lawsuit\Act 77 of 2019.pdf](#)
B. ACT 12 [republican lawsuit\2020 Act 12 - PA.pdf](#)

C. PA ELECTION CODE
- 4. A. ACT 77 [republican lawsuit\Act 77 of 2019.pdf](#)
B. ACT 12 [republican lawsuit\2020 Act 12 - PA.pdf](#)
C. PA ELECTION CODE
- 5. A. ACT 77 [republican lawsuit\Act 77 of 2019.pdf](#)
B. ACT 12 [republican lawsuit\2020 Act 12 - PA.pdf](#)
C. PA ELECTION CODE <https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/25/25.HTM>
D. MEMO FROM DEPARTMENT OF STATE RIGHTS OF WATCHERS, CANDIDATES & ATTORNEYS [republican lawsuit\Rights of Watchers Candidates Attorneys \(002\).pdf](#)
- 9. NONE
- 10. A. SURE REPORT DATED JULY 28, 2020
B. NONE
C. NONE
D. NONE

Revision to INTERROGATORY #5

Wyoming County did not utilize ballot drop boxes for the June 2, 2020 General Primary Election.

Although an email from Jonathan Marks Dated September 17, 2020 stating the PA Supreme court ruled that the Pennsylvania Election code allows County Boards of election to accept hand delivered mail-in ballots at drop boxes and designated locations other than their office addresses. Wyoming County will NOT utilize drop boxes or drop off locations other than the County Office. Electors can return their voted ballot via USPS or in person to the Wyoming County election office.

Revision to INTERROGATORY #7

PA Election Code

ACT 77

ACT 12

E-mail date 5/28/2020 from Jonathan Marks

E-mail dated 9/17/2020 from Jonathan Marks

A. County Election Board convened at 7 O'clock AM on June 2, 2020 to begin the canvassing process. Board of Election was given one precinct at a time to open. The outer envelope was opened, secrecy envelope was removed, placed into a pile and shuffled, secrecy envelope was opened and ballot removed and placed into a pile to be scanned for tally. Ballots were then scanned by precinct into the Clear Count unit located in the County Election office and totals were suppressed until 8 PM after the polls were closed.

Wyoming County Election Board will convene at 7 O'clock AM on November 3, 2020 to begin canvassing of the mail in and absentee ballots. Ballots will be opened according to precinct removed from the inner secrecy envelope and scanned into the clear count unit suppressing the tally until after the close of polls.

B. Approximately 20 ballots arrived at the Wyoming County Elections office that were not inside a secrecy envelope. Referencing the May 28, 2020 E-mail from Jonathan Marks, these ballots were included in the total count. To my knowledge, all declarations were completed. When the ballot is received in the Election Office, the return barcode on the outer envelope is scanned into the State SURE system. Once scanned it pulls up the voter record including signature on file; that signature is verified with the signature on the declaration.

September 17, 2020 the Supreme Court ruled any ballot not inside a secrecy envelope must be rejected, Wyoming County will reject any ballot not in a secrecy envelope per Supreme court ruling.

C. P.A. 25 §3154- does allow for Attorneys and Watchers to be present during the canvass of the ballots, Wyoming county did not receive a request for anyone to be present for the June 2, 2020 Primary.

Wyoming County will strictly adhere to 25 P.S. § 3154 for November 3, 2020 General Election.

Attorneys and Watchers can be present during the Pre canvass and canvassing process.

D. When an Absentee/mail-in ballot is returned to the County board of elections the barcode located on the return label is scanned into the Statewide Uniform Registry of Electors. When scanned the system pulls up the voter record and signature for verification.

Any challenge received by they County board will be addressed by hearing in front of the President Judge of the 44th Judicial District.

Revision to INTERROGATORY #8

Asked for documentation for the answer to INTERRAGATORY #7

ACT 77

Act 12

PA Election Code

E-mail Dated 5/28/2020 from Jonathan Marks